

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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KATHRYN KNOWLTON, DANA McCORMICK,  
et al.,

Plaintiffs,

v.

Case No. 2020-CV-01660

CITY OF WAUWATOSA, BARRY WEBER,  
DENNIS MCBRIDE, et al.,

Defendants.

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**DECLARATION OF KILEY B. ZELLNER IN SUPPORT OF DEFENDANTS'  
MOTION TO QUASH NOTICE OF DEPOSITION FOR KATHY CAUSIER AND  
MOTION TO SUPPRESS PRIOR DEPOSITION TESTIMONY**

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STATE OF WISCONSIN     )  
  ) ss  
MILWAUKEE COUNTY     )

Kiley B. Zellner, being first duly sworn under oath, declares and states as follows:

1. I am an attorney licensed to practice law in the State of Wisconsin and am an attorney with Gunta Law Offices, S.C., which represents the Defendants in this matter. I make this Declaration in support of Defendants' Motion to Quash and Suppress.

2. Attached as **Zellner Declaration Exhibit A** is a true and accurate copy of Plaintiffs' Notice of Deposition emailed to Defense Counsel on September 17, 2021.

3. Attached as **Zellner Declaration Exhibit B** is a true and accurate copy of the email correspondence with the court reporter regarding the Kathy Causier transcript.

4. Attached as **Zellner Declaration Exhibit C** is a true and accurate copy of the Notice of Objection that Defendants sent to Plaintiffs on September 28, 2021.

5. Attached as **Zellner Declaration Exhibit D** is a true and accurate copy of the email Plaintiffs' counsel sent Defendants in response to Defendants Notice of Objection.

6. Attached as **Zellner Declaration Exhibit E** are true and accurate copies of the emails Plaintiffs' counsel sent Defendants forwarding the deposition audio and Notice of Depositions.

7. Although counsel met and conferred in good faith, counsel were not able to arrive at an agreement in relation to the deposition of Kathy Causier.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on September 30, 2021.

/s/ Kiley B. Zellner  
Kiley B. Zellner